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6 Attorneys for BAC Home Loans Servicing, L.P.  
fka Countrywide Home Loans Servicing L.P.  
7 09-77478

8 **UNITED STATES BANKRUPTCY COURT**  
9 **DISTRICT OF NEVADA**

10 In Re:

BK-S-09-21090 BAM

11 JOSE ROBERTO MARTINEZ

Date: January 7, 2010

Time: 1:30 p.m.

12  
13 Debtor.

Chapter 13

14  
15 **SUPPLEMENTAL OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

16 COMES NOW, BAC Home Loans Servicing, L.P. fka Countrywide Home Loans Servicing L.P.  
17 (Hereinafter "Secured Creditor") and files this Supplemental Objection to Confirmation of Chapter 13  
18 Plan stating as follows:

19 Secured Creditor is the first deed of trust holder on 337 Oakford Street, Las Vegas, Nevada,  
20 89110 (hereinafter "subject property"), and is owed over \$184,000.00. The Debtor has filed a motion  
21 to value to reduce Secured Creditor's lien to \$95,041.00. Secured Creditor has filed an opposition to  
22 Debtor's motion to value – said opposition is incorporated herein by reference. The Debtor's plan  
23 should not be confirmed until after the Court reaches a decision on the motion to value.

24 Moreover, Secured Creditor asserts that this Court should not confirm the proposed plan  
25 because 1) there is a complete lack of disclosure by the Debtor as detailed below , and 2) it is not  
26 feasible.

### B. Lack of Feasibility

DATED this 4<sup>th</sup> day of January, 2010

By

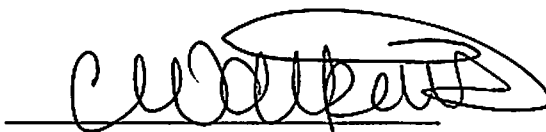
208 South Jones Boulevard  
Las Vegas, Nevada 89107

Certificate of Facsimile

I certify that on January 4, 2010, I served a copy of the foregoing opposition on Debtors'

Counsel by facsimile as follows:

Jorge L. Sanchez, Esq.  
Sanchez Law Group, Ltd.  
Fax No. (702) 537-2800

A handwritten signature in black ink, appearing to read "Jorge L. Sanchez", is written over a horizontal line.